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*Attorneys for Plaintiff*  
*ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ELECTRIC SOLIDUS, INC.  
d/b/a SWAN BITCOIN,  
a Delaware corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD.,  
a British Virgin Islands corporation;  
THOMAS PATRICK FURLONG;  
ILIOS CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO;  
ENRIQUE ROMUALDEZ; and  
LUCAS VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**DECLARATION OF RYAN S.  
LANDES IN SUPPORT OF  
SWAN'S OPPOSITION TO EX  
PARTE APPLICATION TO STAY  
DISCOVERY ORDER OR TO  
SHORTEN TIME ON  
DEFENDANTS' MOTIONS**

Judge: Hon. Michelle Williams Court

Complaint Filed: Sept. 25, 2024  
Am. Compl. Filed: Jan. 27, 2025  
Trial Date: May 4, 2026

**DECLARATION OF RYAN S. LANDES**

I, Ryan S. Landes, declare as follows:

1. I am a partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”) and a member of the bar of this Court. I represent Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin (“Swan”) in the above-captioned matter. I submit this Declaration in connection with Swan’s Opposition To Ex Parte Application To Stay Discovery Order Or To Shorten Time On Defendants’ Motions. Unless stated otherwise, this Declaration is based on my personal knowledge; if called as a witness I could and would testify as follows.

2. Attached hereto as Exhibit A is a true and correct copy of email correspondence between counsel for the parties dated April 23, 2025 and highlighted for the Court’s convenience.

3. Attached hereto as Exhibit B is a true and correct copy of email correspondence between counsel for the parties dated April 29, 2025 and highlighted for the Court’s convenience.

4. Attached hereto as Exhibit C is a true and correct copy of email correspondence between counsel for the parties dated May 5, 2025 and highlighted for the Court’s convenience.

5. Attached hereto as Exhibit D is a true and correct copy of email correspondence between counsel for the parties dated May 15, 2025 and highlighted for the Court’s convenience.

DATED: May 19, 2025

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By *Ryan S. Landes*  
Ryan S. Landes

*Attorney for Plaintiff*  
*Electric Solidus, Inc. d/b/a Swan Bitcoin*